

Attorney Docket No.: 40101/07301

Ref. No.: 2000.034

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REMARKSI. INTRODUCTION

Claims 1, 4-20 and 22-38 are pending in the present application. Claims 1 and 35-38 have been amended. In view of the above amendments and the following remarks, it is respectfully submitted that all of the pending claims are allowable.

II. CLAIM REJECTIONS – 35 U.S.C. § 101

Claims 1, 35 and 38 stand rejected under 35 U.S.C. § 101 as directed to non-statutory subject matter. (See 5/1/07 Office Action, p. 3.) Specifically, the Examiner asserts that the system of claim 35 is directed to software per se without executing hardware, and that claims 1 and 38 are directed to a translator that is merely functional descriptive material. (See *id.*) In view of the amendments to claims 1, 35 and 38, which now all recite the limitation “an output module to output the target file,” it is respectfully submitted that this rejection should be withdrawn.

III. CLAIM REJECTIONS – 35 U.S.C. § 103(a)

Claims 1, 4-20 and 22-38 stand rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent Pub. 2002/0052893 to Grobler et al. (hereinafter “Grobler”) in view of U.S. Patent No. 4,910,704 to Gemma (hereinafter “Gemma”). (See *id.*, pp. 3-10.)

Grobler describes a computer-based method and system for importing a table data from a selected source document into a selected target document. (See Grobler, Abstract.) Specifically, a user of the system may select a source and a target during the import process. (See *id.*, ¶¶ [0060] – [0061].) The selections may be made using either a drag-and-drop function or by a copy-and-paste function of a clipboard provided by the system. (See *id.*, ¶¶ [0019], [0062].)

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Upon selecting the source and target of the import process, the selected source data is temporarily stored within the system. (*See id.*, ¶ [0063].) The table structure of the temporarily stored source data is analyzed by parsing the source data for tags in order to identify columns and rows contained in the source data, in addition to the contents of the columns and rows of the source data. (*See id.*, ¶ [0064].) After the table structure of the source data is analyzed, the system determines whether the user has selected to specify the format of the target table, wherein the user may choose and modify the data contained in the source data. (*See id.*, ¶¶ [0068] – [0069].) After processing the user settings, the system creates an empty target table having a table structure in accordance with the results of the user settings. (*See id.*, ¶ [0070].) Finally, the empty table target is filled with the source data by inserting the contents of the columns and rows of the source data into the empty target table. (*See id.*, ¶ [0072].)

Gemma describes a terminal controller for editing formatted screen data sent from a processing unit to produce edited screen data and for transferring the edited screen data to a mobile device. (*See Gemma*, Abstract.) The edited screen data, which can be used repeatedly, is stored in a buffer memory in the terminal controller. (*See id.*) In response to a command from the processing unit, the data is extracted from the buffer memory so that the screen data is transferred to the terminal device without being re-edited for each transfer. (*See id.*) If desired, the data stored in the buffer memory can be subjected to a synthesizing processing before it is sent to the terminal device. (*See id.*)

Claim 20 recites* “[a] method of translating a file from a source format to a target format, the method comprising: (a) identifying a feature set of a source file; (b) assembling the feature set in a buffer; and (c) writing the feature set into a target file in the target format.” The Examiner acknowledges that Grobler does not disclose “assembling the feature set in a buffer,” as recited in claim 20. (*See 5/1/07 Office Action*, p. 4.) To cure this deficiency of Grobler, the Examiner cites Gemma. However, the use of the buffers disclosed by Gemma is distinguishable from the recitation of claim 20.

* It is noted that the Examiner initially addressed independent claim 20 in the Office Action. (*See 5/1/07 Office Action*, p. 4.) Accordingly, Applicant has addressed the claims in the same order as the Examiner.

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Gemma discloses two different types of buffers: a screen data editing buffer memory 5 and a plurality of edited screen data storing buffer memories 7, 8, 9. (*See* Gemma, col. 2, ll. 59-67.) The screen data editing buffer memory 5 receives screen data 22 from the terminal controller 2 for temporary storage. (*See id.*, col. 3, ll. 31-37.) The screen data 22 is then passed on to the screen data editing circuit 6, where screen data editing processing takes place. (*See id.*, col. 3, ll. 37-39.) Subsequently, the edited screen data is stored in the one of the edited screen data storing buffer memories 7, 8, 9 corresponding to the screen data storing buffer memory number 21 (which, along with the screen data 22, is part of the store data stream received by the terminal controller 2). (*See id.*, col. 3, ll. 32-34, 39-45.) In other words, data is stored in the buffer 5 before processing by the editing circuit 6, and in the buffers 7, 8, 9 after processing by the editing circuit 6, but no processing takes place in any of the buffers 5, 7, 8, 9.

In contrast, claim 20 recites “assembling the feature set *in the buffer*,” i.e., assembly actually takes place in the buffer. This is illustrated by the operation of the exemplary translator 100 of Figure 1. The feature identifier 114 identifies a set of features in the source file 110 (*See* Specification, p. 8, ll. 17-18.) The translator 110 assembles the description of the features read by the feature identifier 114 in an intermediary representation in the buffer 116. (*See id.*, p. 8, l. 33 – p. 9, l. 5.) Only after the translator 100 has completely assembled the representation in the buffer 116 is the writer 118 used to produce the target file 112. (*See id.*, p. 9, ll. 5-10.)

Therefore, Applicant respectfully submits that Gemma does not describe “assembling the feature set in the buffer,” as recited in claim 20, but rather only describes the use of a buffer to store an input before processing, or an output after processing. Thus, Grobler and Gemma, alone or in combination, neither disclose nor suggest “assembling the feature set in the buffer” as recited in claim 20. Accordingly, the rejection of claim 20 should be withdrawn. Because claims 22-33 depend from, and, therefore, include all of the limitations of claim 20, it is respectfully submitted that these claims are also allowable for at least the reasons stated above.

Claim 34 recites “[a] method of configuring a system to translate a source file in a source format to a target file in a target format, the method comprising: (a) providing a feature identifier to determine a feature set of the source file; (b) *providing a buffer to assemble the feature set*;

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and (c) providing a feature writer to write the feature set into the target file in the target format.” For the reasons discussed above with reference to claim 20, Applicant respectfully submits that Grobler and Gemma, alone or in combination, neither disclose nor suggest “providing a buffer to assemble the feature set,” as recited in claim 34. Accordingly, the rejection of claim 34 should be withdrawn.

Claim 35 recites “[a] system for translating a source file in a source format to a target file in a target format, the system comprising: a feature identifier to determine a feature set of the source file; *a buffer to assemble the feature set*; a feature writer to write the feature set into the target file in the target format; and an output module to output the target file.” For the reasons discussed above with reference to claim 20, Applicant respectfully submits that Grobler and Gemma, alone or in combination, neither disclose nor suggest “a buffer to assemble the feature set,” as recited in claim 35. Accordingly, the rejection of claim 35 should be withdrawn.

Claim 36 recites “[a]n article of manufacture for translating a source file in a source format to a target file in a target format, the article of manufacture comprising: a computer usable medium having a computer readable program code embodied therein, the computer usable medium having: computer readable program code for identifying a feature set of the source file; *computer readable program code for assembling the feature set in a buffer*; and computer readable program code for writing the feature set into the target file in the target format.” For the reasons discussed above with reference to claim 20, Applicant respectfully submits that Grobler and Gemma, alone or in combination, neither disclose nor suggest “computer readable program code for assembling the feature set in a buffer,” as recited in claim 36. Accordingly, the rejection of claim 36 should be withdrawn.

Claim 37 recites “[c]omputer readable program code for translating a source file in a source format to a target file in a target format, the computer readable program code comprising: computer readable program code for identifying a feature set of the source file; *computer readable program code for assembling the feature set in a buffer*; and computer readable program code for writing the feature set into the target file in the target format.” For the reasons discussed above with reference to claim 20, Applicant respectfully submits that Grobler and

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Gemma, alone or in combination, neither disclose nor suggest “computer readable program code for assembling the feature set in a buffer,” as recited in claim 37. Accordingly, the rejection of claim 37 should be withdrawn.

Claim 38 recites “[a] translator for translating a source file in an MIF format to a target file in an HTML format, the translator comprising: a feature identifier having a front-end lookup table to map MIF code fragments of the source file to a list of features to determine a feature set of the source file; *a buffer to store and assemble the feature set*; a feature writer having a back-end lookup table to map the feature set to HTML code fragments, to write the feature set into the target file in the HTML format; and an output module to output the target file.” For the reasons discussed above with reference to claim 20, Applicant respectfully submits that Grobler and Gemma, alone or in combination, neither disclose nor suggest “a buffer to store and assemble the feature set,” as recited in claim 38. Accordingly, the rejection of claim 38 should be withdrawn.

Claim 1 recites “A translator for translating a source file in a source format to a target file in a target format, the translator comprising: a feature identifier to determine a feature set of the source file; *a buffer to assemble the feature set*; a feature writer to write the feature set into the target file in the target format; and an output module to output the target file.” For the reasons discussed above with reference to claim 20, Applicant respectfully submits that Grobler and Gemma, alone or in combination, neither disclose nor suggest “a buffer to assemble the feature set,” as recited in claim 1. Accordingly, the rejection of claim 1 should be withdrawn. Because claims 4-19 depend from, and, therefore, include all of the limitations of claim 1, it is respectfully submitted that these claims are also allowable for at least the reasons stated above.

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CONCLUSION

It is therefore respectfully submitted that all of the presently pending claims are allowable. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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